

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS M. GOLD
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

15 MAR -9 PM 1:40

RECEIVED

Derek Rawlings JR
13146486

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

Gang Unit G.
(Correctional Officers) Arnold,
K. Baykin, and Gray (SCJC) Shelby
County Jail

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No ()

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____

4. Name of judge to whom case was assigned: _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: 201 Poplar Ave Memphis, TN 38103

A. Is there a prisoner grievance procedure in the institution?

Yes (X) No ()

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes (X) No ()

C. If your answer is Yes:

1. What steps did you take? I put in a grievance on 10-30-2014 and wrote the chief.

2. What was the result? I been waiting a month and a half for some result but yet to get it.

D. If your answer is No, explain why not: I exhaust my inmate remedies and still have not got a result back so I file a U.S.C.

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff Derek Rawling DE #13144186

Address 201 Poplar Ave Memphis, TN 38103

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant K. Boykin, G. Arnold, ~~B. Gray~~ and K. Gray is employed as Gang Unit Officers at Shelby County Justice Center 201 Poplar at 201 Poplar Memphis, TN 38103

C. Additional Defendants: (S.C.J.C.) Shelby County Justice Center

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

On 10-30-2014 between the time 8:30 and 9:30 am I was in the hallway talking to Sgt. Petterson on the 4th floor southside. We were standing in front of F-Pod 4th floor, and inside of F-Pod a fight with inmates and officers broke out while me and Sgt. Petterson was standing outside of the pod. Officers Mr. Walker and Sgt. Petterson told me to put my back on the wall and that's what I did. After 2 to 3 minutes Mr. Walker told me I couldn't go back in the pod at the time. So Mr. Walker walk me to J-Pod on the northside on 4th floor. I stayed in J-Pod for about 30 minutes and Mr. Walker walked me back to my cell (F-Pod 10 cell). I was in my cell ~~and held~~ for about 10 to 15 minutes that's when (G.I.U.) Gang Intelligence Unit Officers K. Gray, K. Boykin,

and Gr. Arnold pulled me out my cell and told me to come with them. I did what they told me to do because I thought they wanted to ask me questions about what happen. When a big fight happen in the jail Gr. I.U. always pull inmates out to ask questions. But that's not what happen they walked me out the pod with no hand cuffs on and walked me to a class room down the hall from my pod. Soon as I walked in the room Gr. Arnold close the door and that's when K. Baykin hit me in the face. K. Gray was hitting me in the body, and Gr. Arnold was grabbing my legs so he could me on the floor. All them did this at the same time. When they got me on the floor they all start kicking me in the face and the body. K. Baykin put my head between his legs and start hitting me on my back for about 10 sec while Gr. Arnold had my legs with one hand and he was hitting me in the ribs with the other hand. The whole time they was hitting and kicking me I never hit or tried to brake free because I just wanted them to stop hitting and kicking me. I just keep telling them I didn't do nothing to nobody, so why are yall jumping on me? They just keep saying you was in the fight and I'm gone show you not to fuck with a officers, and they keep hitting and kicking me all over my body while I was balled up. After a good minute or two of them hitting and kicking on me they put me in hand cuffs. As soon as they put the cuff on me K. Baykin got up and kicking me in the groin and ~~said~~ said bitch ass nigga. While I was on the floor asking them way did they jump on me for no reason that's when it popped up in my head the only reason they put me in this class room was because there were no cameras in the room. Inmate Thelron Richards #14121492 was in the room the whole time this took place. He was in the corner and I seen K. Gray hitting in the face asking him do he think that he is hard. I set in the class room for about another 30 minutes asking them to talk to Sgt. Patterson but they told me fuck me, we not getting nobody. They took me to medical (I went in the class room without cuffs and came out with some on) because my face looked so bad that I could see that my own eye was on swole, my mouth was bleeding, and my ribs was hurting real bad. The nurse act like she didn't want to do nothing for me because K. Baykin told her I was in a fight with some officers. When I left medical and they let me go back to my cell one of the Gr. I.U. officers took a pictures of my face. After beeing in my cell for a few minutes and looked at my face I started to cry because I had nothing to do with what happen in F-Pod because I wasn't in the pod when everything happen. But they still pulled me out of my cell and took me where no cameras were and beat me profusely and with no regard. I never got write-up for this because I never put my hand on them and because they know they where in the wrong. A few days later I was talking to Sgt. Patterson (this was the first time since they jump on me) and he told me that he told them I didn't have nothing to do with the fight and don't know why they jump on me. I done put 2 grievances in and they still haven't come to say nothing about it to me. I tried to go through the right steps by writing grievances but nothing been done that way. It's been three months now.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

The relief I want sought is \$1,000,000.00 for pain and suffer and emotion damages and injury and also any other relief that court deems, also would like this ~~the~~ civil complaint filed up on (Gang ~~unit~~ officers) Bayking Armory, and Gray individual and official capacities, also I will like this civil complaint filed up on (SCTC) Shelby County Justice Center (201 Poplar) individual and official capacities.

VI. Jury Demand

I would like to have my case tried by a jury. Yes ☒ No ☐.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 6 day of Dec, 20 14.

Derek Rawlings JR #13146486

(Signature of Plaintiff/Plaintiffs)

Derek Rawlings JR #13146486
201 Poplar Memphis, TN 38103